

BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP
CHAIRMAN
GARY PIERCE

COMMISSIONER

BRENDA BURNS

COMMISSIONER

BOB BURNS

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COMMISSIONER

SUSAN BITTER SMITH

COMMISSIONER

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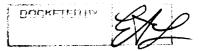
IN THE MATTER OF THE APPLICATION OF EPCOR WATER ARIZONA INC., ARIZONA CORPORATION. FOR DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS RATES AND CHARGES FOR UTILITY SERVICE BY ITS MOHAVE WATER DISTRICT. PARADISE VALLEY WATER DISTRICT, SUN CITY WATER DISTRICT, TUBAC WATER DISTRICT, AND MOHAVE WASTEWATER DISTRICT.

Docket No. WS-01303A-14-0010

Arizona Corporation Commission

DOCKETED

MAY 2 8 2014



RUCO'S MOTION TO COMPEL (EXPEDITED RULING REQUESTED)

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby applies to the Arizona Corporation Commission ("Commission") for an Order granting its Motion to Compel Discovery.

RUCO has propounded a number of data requests in this matter. Of particular importance to RUCO is DR # 1.52 which seeks a schedule of plant additions and retirements by year since the Company's last rate case as well as all supporting invoices and other documentation. See Exhibit 1. The Company has provided RUCO with a response(s) which RUCO views as unresponsive. RUCO is not requesting any changes to the time clock or the

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current procedural schedule but may use this Motion as a basis in the future if it becomes necessary due to RUCO's inability to obtain discovery.

In response, RUCO received Schedules in the format of attached Exhibit 2 (which is a copy of one of the Schedules used here as an example). Attached hereto as Exhibit No. 3 is an example of a schedule the Company's predecessor submitted when filing its last rate case application. Exhibit 3 shows the type of information which is normally provided at the time of filing its rate application or shortly thereafter in a Data Request. What the Company provided to RUCO in this case – i.e. Exhibit 2, is devoid of pertinent information and basically of no use. The Company has not provided the beginning balance per account for the utility plant in service and accumulated depreciation nor the depreciation rates used as was approved in the last rate case. The Company obviously has this information and previous orders do not break this information out by account – which is why Company's normally provide this information when requested. Moreover, RUCO may disagree with the starting points (from the prior Commission Decision) used by the Company which it is unable to even consider in this case without the information. In addition to the beginning balances for each district, RUCO needs all additions, retirements, adjustments, and journal entries for each year by plant account since the last rate case. Also, RUCO needs the accumulated depreciation balance for each year since the last rate case. (See Exhibit 3 as was completed by the Company in prior rate filing). RUCO also needs the end balance to make sure it agrees with the plant balance for the test year.

Further, the Company has only provided limited invoices which can be seen from its response (Exhibit 1). RUCO sought all the invoices going back to the last rate case not just the invoices from February 2012 through 2013 (there were different test years for some of the districts but they were all before 2012). In addition, these invoices are of no use to RUCO without the completed schedules that they relate to.

RUCO originally sent this data request on April 15, 2014. (See Exhibit 4). RUCO has been in touch with the Company and the Company has been acting in good faith and supplementing the information but for the reasons stated above RUCO still is not satisfied with the responses. RUCO is not requesting anything more than what the Company is required to keep as part of its records under the Commission's rules.

A.A.C. R14-2-102 provides in relevant part:

- B. All public service corporations shall maintain adequate accounts and records related to depreciation practices, subject to the following:
- 1. Annual depreciation accruals shall be recorded.
- 2. A separate reserve for each account or functional account shall be maintained.
- 3. The cost of depreciable plant adjusted for net salvage shall be distributed in a rational and systemic manner over the estimated service life of such plant.
- 4. Public service corporations having less than \$250,000 in annual revenue shall not be required to maintain depreciation records by separate accounts but shall make annual composite accruals to accumulated depreciation for total depreciable plant.

A.A.C. R14-2-411 also states the following:

- D. Accounts and records
- 1. Each utility shall keep general and auxiliary accounting records reflecting the cost of its properties, operating income and expense, assets and liabilities, and all other accounting and statistical data necessary to give complete and authentic information as to its properties and operations.
- 2. Each utility shall maintain its books and records in conformity with the NARUC Uniform Systems of Accounts for Class A, B, C and D Water Utilities.
- 3. A utility shall produce or deliver in this state any or all of its formal accounting records and related documents requested by the Commission. It may, at its option, provide verified copies of original records and documents.

This particular data request goes to the heart of the case, the valuation on the plant, and it is therefore imperative that RUCO receive the requested information. RUCO is not

1 suggesting that the Company has to provide it in the exact same format as its predecessor did 2 although that would be best – as long as the Company provides the complete information and 3 in a format that is easy to understand. 4 WHEREFORE, RUCO requests the Commission grant its Motion to Compel. 5 RESPECTFULLY SUBMITTED this 28th day of May, 2014 6 7 8 9 Chief Counsel 10 11 AN ORIGINAL AND THIRTEEN COPIES of the foregoing filed this 28th day of May, 2014 with: 12 13 **Docket Control Arizona Corporation Commission** 1200 West Washington 14 Phoenix, Arizona 85007 15

COPIES of the foregoing hand delivered/ mailed this 28th day of May, 2014 to:

17 Dwight Nodes
Hearing Division
18 Arizona Corporation Commission
1200 W. Washington
19 Phoenix, Arizona 85007

20 Robin Mitchell
Matthew Laudone
21 Legal Division
Arizona Corporation Commission
22 1200 West Washington
Phoenix, Arizona 85007

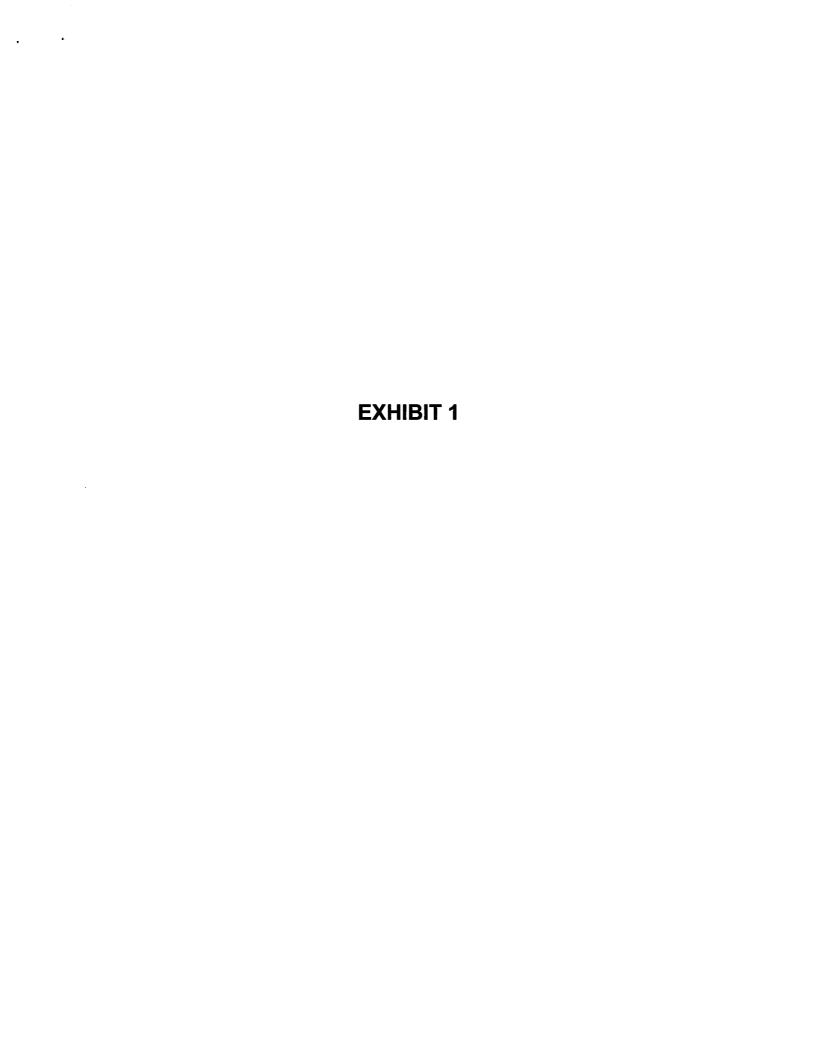
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Steve Olea, Director
Utilities Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Jay Shapiro Todd Wiley Fennemore Craig, P.C. 2394 E. Camelback Road, Suite 600 Phoenix, Arizona 85016

By Cheryl Fraulob



EPCOR Water Arizona Inc. COMPANY: DOCKET NO:

WS-01303A-14-0010

Response provided by:

Sheryl L. Hubbard

Title:

Director, Regulatory & Rates

Address:

2355 W. Pinnacle Peak Road, Suite 300

Phoenix, AZ 85027

Company Response Number: RUCO 1.52

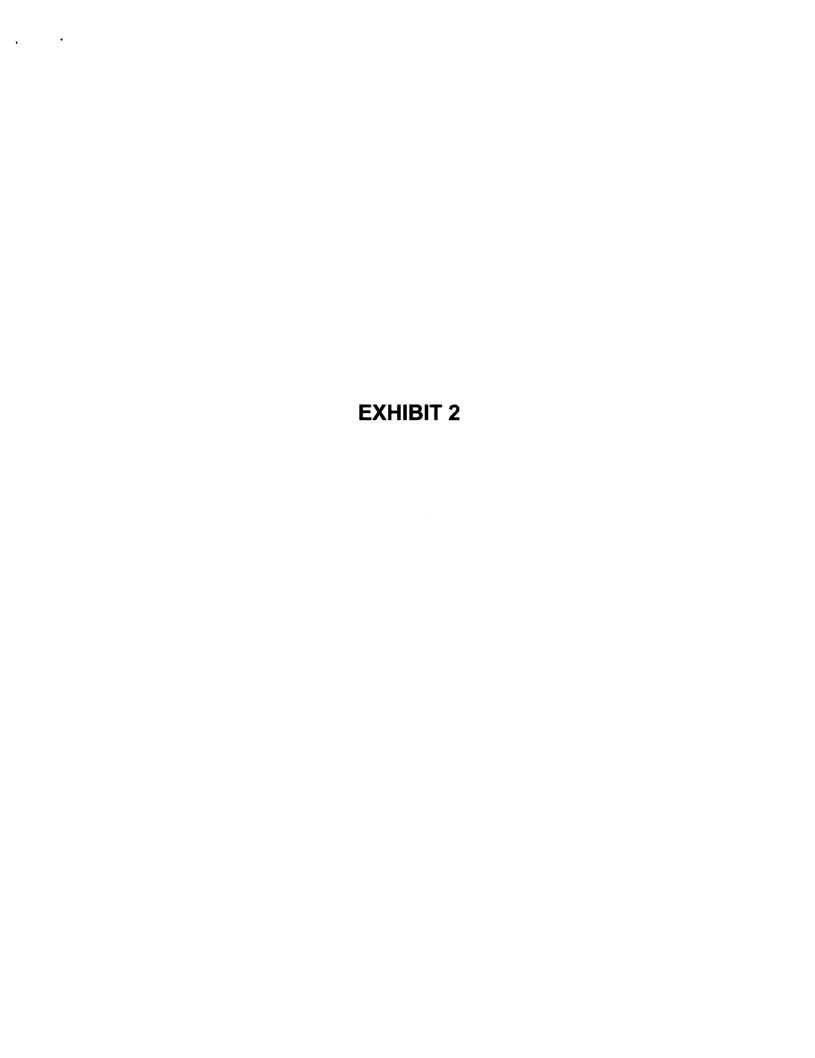
Q: Plant Additions and Retirements – Please provide a schedule of plant additions and retirements by year and by line item (e.g., 307 Wells and Springs) in excel format, for each of the intervening years since the test year in the Company's prior rate case through the end of the test year in the current filing. In addition, provide the invoices and other supporting documentation for all of these additions and Retirements.

In addition, please include post-test year invoices.

A: Attached are the authorized depreciation rates for Mohave Water (Docket 10-0448: Decision No. 73145), Sun City Water (Docket 09-0343; Decision No. 72047), and Paradise Valley Water, Tubac Water and Mohave Wastewater (Docket 08-0227: Decision No. 71410). The plant additions, retirements, and adjustments by year and NARUC plant account number for the period February 1, 2012 through the end of the test year June 30, 2013 are attached and labeled "RUCO 1.52 PPE Rollforward – Feb '12-Jun '13.xlsx". The Company is preparing the requested information for the period between the test year in each district's last rate case through January 31, 2012 in the same format as is provided with this response.

The invoices for the February 1, 2012 through June 30, 2013 period were provided on a CD in response to the Arizona Corporation Commission Staff's data request number STF 1.3.

This response will be supplemented as soon as the remaining outstanding information is completed.



Response to Data Request No. RUCO 1.52

MCRP2201 AZ-Sun City Water

GLFY Jan-12

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347000 (6,669.17) (6,669.17)				(1,126.34)	(1,126.34)
				(174,797.19)	(174,797.19)
Grand Total (35,410.17) (14,095.65) (67,023,888.57) (67,073,394.39)					
	Grand Total	(35,410.17)	(14,095.65)	(67,023,888.57)	(67,073,394.39)



sted Balance ince per JDE ber December 07 2007	» ፠ ጀ	624,652 624,652 9,020,159 9,020,159 4,836,856 4,836,856 1,162,010 1,62,010 3,550,952 3,550,952		±	, K				
Beg bal in Adjusted test case Balance included December Corp allocation 2007		624, 9,020, 4,836, 1,162, 3,550,	173,	11,874,350 828,646 21,181,281 11,872		1,271, 9,503, 9,747,	1,271,551 9,503,375 9,747,586 5,777,927 21,371,152 31,329,474	9,503,375 9,747,595 9,747,597 21,371,152 21,371,152 27,284,414 13,724,400 11,593,276 11,593,276 11,793,410	9,503, 9,747, 9,747, 21,371, 21,371, 21,372, 13,724, 13,724, 13,724, 11,783, 11,783, 11,783, 11,783, 11,783, 11,783,
Staff #1 Disallowed Rancho Cabrillo no invoices							1, 189,832		
LJG - 11 Post TY Plant Additions		(192 154)		•			(205,286)	(205,286)	(205, 286)
RUCO RB #4 Correction of Tmf SCW plant				(18,581)					
LGJ - 1 Retirements from Jul 04 Dectsion	4,619	11,196		15,122		3,442	3,442 34,414 7,710	34,414 34,414 7,710	34,414 34,414 7,770
Adj LJG-3 Remove Dec 07 Corp JE to districts				(6.865) (15,127) (52,838)		(218,139)	(218.139)	(218,138)	_
LIG 4,5 Remove Common Plant Allocations			(48.860)						(241,927) (283,398) (387,190) (10,057)
Approved Dec. 71410 December 2007	\$ 1,229 321,997 1,429,017 (28,462)		173,284	11,881,215 843,773 21,237,648 11,872	1,271,551	9,718,072	9,718,072 9,713,171 5,710,217 21,371,152 31,534,704	9,718,072 9,713,171 21,371,152 31,554,784 13,554,784 13,734,400 18,873 11,273,032 4,680,273 11,773,410 11,773,410 212,350	
Jin Dec 2009 Monthly Depr. Rate	%00:0 %00:0 0:00%	0.00% 0.00% 0.21% 0.14%		0.21% 0.21% 0.09% 0.28% 0.37%	0.37% 0.37% 0.37%	0.33%			
Approved in Dec No. 71410 Dec 2009 Annual Monthly Depr. Depr. Rate Rate Rate Const.	%00.0 %00.0 %00.0	0.00% 0.00% 2.50% 1.67%	1.67% 1.67% 2.50%	2.50% 2.52% 1.11% 3.33% 4.42%	4.42%	4.00% 4.00% 4.00%) 4 4 4 4 4 4 4 4 4 6 6 6 6 6 6 6 6 6 6	144	144
Reconcile Agua Fria Water Plant & Accum Depr. to Amounts Previously Approved Object Sub. Account Account	301000 Organization 302000 Franchises 303200 Land & Land Rights SS 303300 Land & Land Rights P	3005400 Land & Land Rights WT 300560 Land & Land Rights TD 304100 Struct & Imp PS 304200 Struct & Imp PT 304300 Struct & Imp PT 304400 Struct & Imp VIT				311500 Fump Equap Ouner 311530 Pumping Equipment WT 320100 WT Equip Non-Media 320200 WT Equip Fitter Media 330000 Diet Reserviris & Standniee	311300 Pumping Equipment WT 320100 WT Equip Rhan-Media 220000 WT Equip Rhan-Media 230000 Dist Reservoirs & Standpipes 330000 Dist Reservoirs & Standpipes 330100 Eleveted Tanks & Standpipes 330100 Eleveted Tanks & Standpipes 33100 TD Mains Not Classified by Size 33100 TD Mains fin to Bin 331300 TD Mains 6in to Bin 331300 TD Mains (6in to Bin 331300 TD Mains (6in to Bin	311300 Pumping Equipment VIT 320100 VMT Equip Non-Media 3202010 VMT Equip Non-Media 3302000 VMT Equip Pitter Media 3302000 Delt Reservoira & Standpiper 3303000 Delt Reservoira & Standpiper 3303000 Elevated Tarks & Standpiper 3303000 Ground Level Facilities 330400 Cleanwell at Less 331400 TD Mains Not Clessified by Siz 331400 TD Mains Bin to Bin 331400 TD Mains Bin to Bin 331400 TD Mains 10n to 16in 331400 TD Mains 10n to 16in 331400 Delta Nains 10n to 16in 332000 Services 334300 Meter Vaults 334300 Meter Vaults 335000 Hordrants	311300 Pumping Equipment WT 320100 WT Equip Mon-Media 320000 WT Equip Mon-Media 330000 Det Reservoire & Standpipes 330100 Elevated Tanks & Standpipes 330100 Elevated Tanks & Standpipes 330100 Clearwell 33100 TD Marins file & Less 33100 TD Marins file to Bin 33100 TD Marins file to Bin 33100 TD Marins file to Bin 332000 Fire Marins 333000 Services 334000 Medier Vile 332000 Hire Marins 334000 Medier Vile 335000 Hydratis 335000 Other PIE Misc 33500 Other PIE Misc 34100 Trans Equip Li Duty Triss 34100 Trans Equip Li Duty Triss 34100 Trans Equip Hyy Duty Triss 34100 Trans Equip Other Tries
Sub.									

Color Colo		Object S 101000 101000 101000 101000 101000	Reconcile Agua Fria Water Plant & Accum, Depr. to Amerinte Previously Americal						Fodioa					Froging of			
1000	10.000 1.000 1.000 1.000 1.000 1.000	ŀ	iub. Description	Difference					Balance December 2008	Additions 2009	Retirements , 2009	Adjustments 2009	Depr. Expense 2009	Balanca December 2009	Additions Jun-10		Adjust
10.000 1.0	10.000 1.0		01000 Organization 02000 Franchises		. 058	١	-		363,720	, ,				363,720	· ·		_
State Color Details Colo	Comparison Com		03200 Land & Land Rights SS	40,774	93,996	, ,	228 GKR	• •	1,486,859		•			1,670,515	(11,980)		
Color Colo	Column C		03400 Land & Land Rights WT	90					624,652			14,871	•	639,523		•	
March Marc	Section Sect		103500 Land & Land Rights 1D 04100 Struct & Imp SS	0	1,462,340		(2,591,975)		7,890,523		(6,274)	,	256,160	12,048,066	299,442 (2,071,413)	, ,	
March Marc	Column C		104200 Struct & Imp P	0	170,452	•		81,995	5,007,308	225,488	•		86,743	5,232,796	1,873,315	(14,771)	
Section Section 1, 19, 19, 19, 19, 19, 19, 19, 19, 19,	Section Secretary Color Section Se		104300 Struct & Imp WT 04400 Struct & Ime TD	o 0	429,355 88,054		2.591,975	60,515 62.077	3.639,006	6,487,637			78,797	3.639.459	75,836		
10.000 1	20000 Late for process of the proces		04500 Struct & Imp AG	٠.	,	•		,	,	11,419,437			3	11,419,437	155,992	•	
1000 Court in the control of court in the cour	Second Colored Personal State Part State		04600 Struct & Imp Offices	()				3,518	173,284	•		•	3,518	173,284			
1000 Outs fame Control Means Control M	1000 Outside Strong		04620 Struct & Imp Leasenoid 05000 Collect & Impounding							739 631	•		,	739 631	, 8 6.46		
1000 Now Hole Accordance 10 10 10 10 10 10 10 1	10.000 Note Activation 1.000 1		06000 Lake, River & Other Intakes	ı	٠	ı			٠	1,177,107	•		•	1,177,107	13,760		
Strict Development Comparing Compari			07000 Wells & Springs	0	(17,856)	٠		313,321	11,856,493	3,337,174	,	•	344,488	15,183,687	(240,520)		
11100 Purp Equip Desert 6 2.282.559	11100 Purple Each Each Each Each Each Each Each Each		09000 Supply Mains 10100 Power Generation Foreign Other	(89,876)	75,108			27 711	164,984 844 415	7.742,543			3,485	1,907,527	137,468	•	
1100 Pump Elegan Pump 140 Pump Elegan Pump 140 Pump Elegan Pump Pump Pump Pump Pump Pump Pump Pump	31100 Purp Eleph Deem 46 46 46 46 46 46 46 4		11200 Pump Equip Electric	. 0	2,328,558	(114,148)	•	970,087	23,395,701	14,676,024	(51,846)	2,072	1,285,527	38,021,951	(7.847,265)	(389)	
11.00 Demonstration (a) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c	11.00 Demonst Engineering 11.0		11300 Pump Equip Diesel	4		•		523	11,824	•	·	•	523	11,824	•	. '	
			111400 Pump Equip Hydrausc 11500 Dumn Equip Other	(4.8) (4.8)	(48)	•	•	0 475 44	1 262 867	•		•	25 278	4 252 607	•		
2000 ON Virginish children (2004)371 2004 ON Virginish childre	2000 Mile Spire New Age		11530 Pumping Equipment WT	(18.653)	(325)		. ,	810	18,328		. ,		810	18.328			
200000 Date Relation 286,541 286,524 22,250 1167 154 20,354 2	20000 Observation state with seasons at Samples (246.51) 165.54 (146.54) 165.5		20100 WT Equip Non-Media	284,631	(626,973)	•		380,018	8,591,771	26,131,843	(21,544)	•	431,003	34,702,070	824,232	(7,436)	
State Stat	State Stat		20200 WT Equip Filter Media	(284,631)	895,524		٠	23,250	1,180,155	683,957			49.462	1,864,112	7,995	•	
30000 Conserved Law Facilists 3 1 408,414 (4) 6134 4 214,520 (2014 621) 200,688 1 200,889 1 200,899 1 200,	331000 Canaval field fie		Sutto List Reservoirs & Standoppe 30100 Flevated Tanks & Standopes	,	35.344			208,491 50 56	35.344	racional	٠.		587,102	35344	724,316		
30000 Casement kind level (et al. 224, 248) 1 50, 544 4, 423, 489 1 50, 544 4, 423, 489 1 50, 544 4, 423, 489 1 50, 544 4 4, 224, 71 215, 200 1 Casement kind level (et al. 224, 200 1	33000 Compare Equation 10, 13, 148, 141 33100 To Mains Not Classified by Sea, 14 33100 Mains Not Classified by Sea, 14 3310 Mains Not Classified by		30200 Ground Level Facilities		,		,	3,		2,004,886			13,925	2,004,866	(2,003,837)	•	
3100 10 bases at a base of the company of the compa	20,000 Data to teament by Saz 2, 1, 2, 2, 1, 2, 2, 1, 2, 2, 1, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2, 2,		30400 Clearwell	, ;			•		,	4,324,861		•	5,949	4,324,861	50,554	•	
313000 TD Marris fine fine fine fine fine fine fine fine	Strict Di Luiers file to Graph Control Decision		31001 TD Mans Not Classified by Size 31100 TD Mains Ain & Less	S E	1,498,414	. (48)		89.394 37.438	7,216,309	(821,165) 69 026	712		328 702	6,595,144	252.471		
333000 Part Field Cells (10) 146,000 Control Equipment (100 Cells	331000 D Delania title day 6 to 1 1285 5 to 1 1485 5 t		31200 TD Mains 6in to 8in	<u></u> 0	3,291,523	€.	•	513,384	34,821,001	2,665,393			564,876	37,286,394	1,218,255	(180)	
State March State Stat	State March State Stat		31300 TD Mains 10in to 16in	. o	2,380,657		•	443,782	29,665,071	1,080,442	•	107,067	473,108	30,832,580	926,508	,	
343000 better restations a	343000 deveres (1) (25527) (2514) (2515) (2514) (2515) (25		331400 TD Mains 18in & Gru 32000 Fire Mains	(Q) 94 92 8 24	164,060		ı	322,644	13,938,460	4,217,993	,	857,000	343,622	19,013,453	1,730,332		
3.45100 Weetings 3.4510 Weetings 3.45100	33400 Meter intailation		33000 Services	9	1,265,773	(3,514)	,	297, 102	12,535,292	631,787	(3,699)	•	319,514	13,163,380	71,495	(355)	
334300 Meter Institutions 0 19331 . 39,77 4 (570) 40,772 (6570) . 40,774 1,5860 10 (970) Meter Institutions 0 19331 . 39,774 (2389) 91 244,79 1,288,070	353.000 Metainstallations 0 18,331		34100 Meters	O	693,633	(42,778)	,	124,560	5,317,687	229,600	(59,401)	٠	154,595	5,487,885	254,182	(34,224)	
335000 Other Pieter Values	335000 Hydrate Values 265,028 (3.89) 91 246,779 (2.98) 71,289 677 (7.00) 19.987 (7.00) 19.957 (7.00)		34200 Meter Installations	0	19,331	,		39,777	1,602,607	(6.570)	•	,	40,174	1,596,037	9		
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340300 Computer Schwarer Other 34100 Trans Equip Loby Tras 34100 Trans Equip Loby Tras 34100 Trans Equip Loby Tras 341400 Trans Equip Hy Duby Tras 341400 Trans Equip Loby Tras 341400 Trans Equip Hy Duby Tras 341400 Trans Equip Loby Tras 341400 Tras Equip Tra	340300 Computer Software 34100 Trans Equip LID Day Tras 34100 Trans Equip LiD Day Trans 34100 Trans Equip LiD Day Tras 34100 Trans Equip LiD Day Trans 34100 Tr		40200 Comp & Periph Equip	90	5,954	٠,		3,732	92,964 80,628	٠.	(8.849)		3,752	71,779	4	. ,	
34/100 Trans Equip Chorage Compute Compute Chorage Advances - Chor	34/100 Trans Equip LUbuy Trias 0 20,864 20,664 20,667 4,906 20,311 20,667 20,311 4,906 20,311 20,267 20,311		40300 Computer Software	•	•		•	•	•	5,508	. '	•	682	5,508			
Monthly Depocation Equipment 30,311 30,024 20,315 30,410 31,410	34100 Trans Equip Chief and Low First and Low Committed First and Low Fi		40330 Computer Software - Other	, '					, 1				;	, ;			
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346100 Comm Equip Non-Telephone 72,415 40,788 1,431,549 1,431,649 1,431,641 1,435,838 88.88 8	346100 Comm Equip Non-Telephone 72,415 40,788 1,431,549 1,431,610 4,784 1,435,638 95,838 346100 Comm Equip Non-Telephone 72,415 209,409 19,389 281,825 3,344,025 7,435,836 95,838 95,839 346130 Comm Equip Other 4,800 13,635 6,800 19,019 385,785 1,6019 36,785 1,619 386,785 1,619 386,785 1,619 386,785 1,619 386,785 1,175 3,880 3,880 </td <td></td> <td>44000 Laboratory Equipment 65000 Power Cograted Equipment</td> <td>. 6</td> <td></td> <td></td> <td></td> <td>. 589</td> <td>30.559</td> <td>324,770</td> <td></td> <td></td> <td>- 883</td> <td>324,770</td> <td>3,796</td> <td>•</td> <td></td>		44000 Laboratory Equipment 65000 Power Cograted Equipment	. 6				. 589	30.559	324,770			- 883	324,770	3,796	•	
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347000 Miscelaneous Equipment 4800 19.09 385,785 100,530 1.175 36200 Commit Equipment 4800 19.09 386,785 18.00 19.09 386,785 18.00 19.09 386,785 18.00 19.09 386,785 18.00 19.09 386,785 18.00 19.09 1	343000 Commercaçule relevance 4,800 19,019 385,785 100,530 1,175 385,000 Commercaçule relevance 4,800 13,635 1,175 385,785 100,530 1,175 385,000 Commercaçule relevance relevance relavance relevance relavance relavanc		46190 Remote Control & Instrumentati	(72,415)	209,409		•	19,393	281,825	3,354,025			70,957	3,635,850	95,839	•	
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224,300,369 \$ 224,300,369 \$ 5,033,729 \$ 1,02,24 \$ 13,024 \$ 1,02,24 \$ 1,	T 224,300,369 \$ <th< td=""><td></td><td>y Plant</td><td>-</td><td></td><td>(162,872)</td><td>\$ 229,059</td><td>ĺ</td><td>224,300,369</td><td>\$93,748,239</td><td>\$ (155,829)</td><td>981,009</td><td>Į.</td><td>ı.</td><td>\$ (2,012,605)</td><td>\$ (58,767)</td><td></td></th<>		y Plant	-		(162,872)	\$ 229,059	ĺ	224,300,369	\$93,748,239	\$ (155,829)	981,009	Į.	ı.	\$ (2,012,605)	\$ (58,767)	
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Arizona American Water Company - Agus Fria Water Test Year Ended June 30, 2010 Rate Base Adjustment SLM-1

Exhibit Schedule B-2 Page 4 Witness: Murrey



RESIDENTIAL UTILITY CONSUMER OFFICE

www.azruco.gov

1110 WEST WASHINGTON · SUITE 220 · PHOENIX, ARIZONA 85007 · PHONE: (602) 364-4835 · FAX: (602) 364-4846

Janice K. Brewer Governor Patrick J. Quinn Director

April 15, 2014

Sheryl Hubbard 2355 W. Pinnacle Peak Road, Suite 300 Phoenix, Arizona 85027 shubbard@epcor.com

Re: RUCO's First Set of Data Requests to EPCOR Water Arizona, Inc. - ACC

Docket No. WS-01303A-14-0010.

Dear Ms. Hubbard:

Attached is the Residential Utility Consumer Office's ("RUCO") First Set of Data Requests to Chaparral City Water Company ("Company"). RUCO should expect to receive the Company's response on or before Friday, April 25, 2014.

Please indicate the person or persons responsible for compilation of the information provided in response to these Data Requests, and the witness to whom questions regarding that information should be directed. Please see the attached list of definitions and explanations for further instructions.

These requests are continuing in nature. Accordingly, the Company is requested to supplement prior responses if it receives or generates additional information, reports, or other data within the scope of these data requests between the time of the original response and the hearing.

RUCO's First Set of Data Requests April 15, 2014 Page 2

If any request is considered overly burdensome or would require the production of a voluminous amount of material, contact me at RUCO as soon as possible to discuss clarification or possible limits to the Company's response.

Please provide one copy of the requested data directly to each of the following addresses:

- 1) Daniel W. Pozefsky
 Chief Counsel
 Residential Utility Consumer Office
 1110 West Washington Street
 Suite 220
 Phoenix, Arizona 85007
 dpozefsky@azruco.gov
- 2) Robert B. Mease
 Chief Accounting and Rates
 Residential Utility Consumer Office
 1110 West Washington Street
 Suite 220
 Phoenix, Arizona 85007
 rmease@azruco.gov

If you have any questions, please do not hesitate to contact me.

Thank you for your time and cooperation.

Very truly yours,

Daniel W. Pozefsky Chief Counsel